

December 6, 2004

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Dear Ms. Dortch:

**RE: Ex Parte Notice. WC Docket No. 04-313. Unbundled Access to Network Elements**

On December 3, 2004, Morton Bahr, President of the Communications Workers of America, sent a letter to Chairman Michael K. Powell and Commissioners Kathleen Abernathy, Michael Copps, Jonathan Adelstein, and Kevin Martin in the aforementioned proceeding. In the letter, Mr. Bahr urged the Commission to adopt sustainable unbundling rules that would encourage investment, good jobs, and accelerated deployment of universal affordable broadband networks. Since recent decisions by the Commission to remove unbundling on new technologies have resulted in accelerated deployment of advanced fiber networks, Mr. Bahr urged the Commission to “stay the course” and not impose legacy regulations on new technologies. Mr. Bahr also urged the Commission to find no impairment on switching; to set an impairment standard for loops and transport based on the number of business lines served by the wire center; and to find no impairment for special access.

Sincerely,

Debbie Goldman, Research Economist  
Research and Development Department

cc: Chairman Michael C. Powell